UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SHOLOM GOLDSTEIN; RABBI SIMCHA GOLDSTEIN; SARAH BREINA GOLDSTEIN; SHAINA KUTTEN; SHIMON GOLDSTEIN; YECHEZKAL SHRAGA GOLDSTEIN; AVROHOM DAVID GOLDSTEIN; HENDEL LEZER; DOVY GOLDSTEIN; CHAYA CHANA HOFFMAN; YAAKOV YOSEF GOLDSTEIN; BAS-SHEVA GOLDSTEIN; MOISHE GOLDSTEIN; PERLA GOLDSTEIN; TOBY GOLDSTEIN; YISROEL YEHUDA GOLDSTEIN,

Plaintiffs,

– against –

ARAB BANK, PLC,

Defendant.

COMPLAINT

___ Civ. ______

Plaintiffs Sholom Goldstein, Rabbi Simcha Goldstein, Sarah Breina Goldstein, Shaina Kutten; Shimon Goldstein, Yechezkal Shraga Goldstein; Avrohom David Goldstein, Hendel Lezer; Dovy Goldstein, Chaya Chana Hoffman; Yaakov Yosef Goldstein, Bas-Sheva Goldstein; Moishe Goldstein; Perla Goldstein, Toby Goldstein; and Yisroel Yehuda Goldstein (collectively, “Plaintiffs”), by and through their undersigned counsel, for their Complaint against defendant Arab Bank, PLC (“Defendant” or “Arab Bank”), hereby allege as follows:

NATURE OF ACTION

1. Plaintiffs were injured by a suicide bombing that Hamas, a terrorist organization, committed in Jerusalem on August 19, 2003. Plaintiff Sholom Goldstein was aboard the No. 2 Egged bus in Jerusalem when a suicide bomber sent by Hamas detonated an explosive device, killing 23 people and wounding many more, including Sholom Goldstein. The remaining Plaintiffs are members of Sholom Goldstein’s family—his mother, his father, his brothers and

sisters—each of whom has been injured and suffered emotional distress as a result of the attack. Plaintiffs are vindicating their federal rights by suing Arab Bank, PLC, under the federal Anti-Terrorism Act (the "ATA"). Arab Bank violated the ATA because it aided and abetted, financed, and provided material support to Hamas and its terrorists, knowing that Hamas was a terrorist organization and that its support would assist the suicide bombings and other murderous acts of terror that Hamas conducts.

2. In a separate action brought by a different group of plaintiffs—including other victims of the August 19, 2003 attack on Bus No. 2—Arab Bank has already been found liable for violating the ATA and providing material support to Hamas. Arab Bank is equally liable to and, indeed, is collaterally estopped from denying liability to, Plaintiffs in this aciton.

INTRODUCTION

3. The Anti-Terrorism Act is a comprehensive anti-terror statute. *See* 18 U.S.C. § 2331 *et seq*. Congress passed and the President signed the ATA to "provide a new civil cause of action in Federal law for international terrorism that provides extraterritorial jurisdiction over terrorist acts abroad against United States nationals." *In re September 11 Litigation*, 751 F.3d 86, 93 (2d Cir. 2014). The ATA makes it unlawful to commit, attempt to commit, or conspire to commit homicide or physical violence against a United States national, when such national is outside the United States. 18 U.S.C. § 2332. The ATA also makes it unlawful to provide material support to terrorists, *id.* § 2339A, to provide material support to foreign terrorist organizations, *id.* § 2339B, and to finance terrorism, *id.* § 2339C. And the ATA provides a civil cause of action in federal district court for any United States national injured in his or her person, property, or business by reason of such an act of international terrorism, as well as a cause of action for that person's estate, survivors, and heirs. *Id.* § 2333.

4. On August 19, 2003, Plaintiff Sholom Goldstein was riding the No. 2 Egged bus when a suicide bomber sent by Hamas detonated an explosive device aboard that bus. Sholom Goldstein was injured in that attack, and the fifteen other plaintiffs—all family members of Sholom Goldstein—suffered mental and emotional distress by reason of Hamas's terrorist attack. The attack of August 19, 2003, like many other attacks committed by Hamas and other terrorist organizations, was designed to intimidate and coerce the civilian population of Israel and the government of Israel through mass destruction and murder.

5. Arab Bank knowingly, recklessly, and willfully aided and abetted the commission of this and other terrorist acts. Arab Bank also knowingly, recklessly, and willfully financed and provided material support to Hamas, its terrorists and front organizations, and other terrorists and terrorist organizations. Arab Bank knowingly financed and provided material support to Hamas by knowingly administering financial benefits and compensation to Hamas terrorists and their families, and by knowingly providing banking, financial, and other services to Hamas, its leaders, affiliates, and terrorists. Arab Bank transferred millions of dollars on behalf of charities and committees like the Saudi Committee whose avowed purpose was to support terrorists and their activities. Arab Bank's support was material, and it substantially aided Hamas's terrorist activities. When Arab Bank provided this support, it knew or recklessly disregarded that Hamas is a terrorist organization. Without Arab Bank's support, Hamas would have been less effective in financing its operations, recruiting terrorists, and compensating terrorists and their families for their acts of international terrorism. Plaintiffs were injured by reason of Arab Bank's unlawful activities.

6. A jury in the United States District Court for the Eastern District of New York has already found that Arab Bank violated the ATA by providing material financial support to

Hamas in connection with this very attack and other attacks too. In light of the jury verdict against it, Arab Bank is estopped from contesting its liability to Plaintiffs.

JURISDICTION AND VENUE

7. This Court has subject matter jurisdiction over Plaintiffs' claims under 28 U.S.C. § 1331, because this case arises under the laws of the United States. This Court also has subject matter jurisdiction over Plaintiffs' claims under 18 U.S.C. § 2333 and § 2334, because this is a civil action brought by citizens of the United States, and their estates, survivors, and heirs, who have been injured in their person, property, or business by reason of acts of international terrorism.

8. Venue is proper in this Court under 28 U.S.C. § 1391 and 18 U.S.C. § 2334.

9. Arab Bank is subject to personal jurisdiction in New York under 18 U.S.C. § 2334 and N.Y. C.P.L.R. § 301 and § 302.

PARTIES

10. Plaintiff Sholom Goldstein is a citizen of the United States and of the State of New York, and he resides in Kings County. He was aboard the No. 2 Egged bus on August 19, 2003, when a suicide bomber sent by Hamas detonated an explosive device on that crowded bus. The attack injured Sholom Goldstein and caused him physical pain and emotional distress.

11. Plaintiff Rabbi Simcha Goldstein is a citizen of the United States and of the State of New York, and he resides in Kings County. He is the father of Sholom Goldstein. He suffered emotional distress as a result of the Hamas terrorist attack on the No. 2 bus.

12. Plaintiff Sarah Breina Goldstein is a citizen of the United States and of the State of New York, and she resides in Kings County. She is the mother of Sholom Goldstein. She suffered emotional distress as a result of the Hamas terrorist attack on the No. 2 bus. She was

pregnant at the time of the terrorist attack, and her husband initially tried to shield her from news of the attack. When she saw a picture of the hollowed-out bus, however, she experienced such distress that she went into labor. Two days after the attack, she gave birth to her son at 37 weeks. Her doctor has stated that the attack caused her such emotional distress that it induced the childbirth.

13. Plaintiffs Sholom Goldstein, Rabbi Simcha Goldstein, and Sarah Breina Goldstein have spent substantial amounts of money on healthcare for Sholom Goldstein since the attack.

14. Plaintiff Shaina Kutten is a citizen of the United States and of the State of New York, and she resides in Kings County. She is the sister of Sholom Goldstein. She suffered emotional distress as a result of the Hamas terrorist attack on the No. 2 bus.

15. Plaintiff Shimon Goldstein is a citizen of the United States and of the State of New York, and he resides in Kings County. He is the brother of Sholom Goldstein. He suffered emotional distress as a result of the Hamas terrorist attack on the No. 2 bus.

16. Plaintiff Yechezkal Shraga Goldstein is a citizen of the United States and resides in Israel. He is the brother of Sholom Goldstein. He suffered emotional distress as a result of the Hamas terrorist attack on the No. 2 bus. He was in Israel at the time of the attack and witnessed first-hand Sholom Goldstein's struggles in the immediate aftermath of the attack.

17. Plaintiff Avrohom David Goldstein is a citizen of the United States and of the State of New York, and he resides in Kings County. He is the brother of Sholom Goldstein. He suffered emotional distress as a result of the Hamas terrorist attack on the No. 2 bus. He was in Israel at the time of the attack and witnessed first-hand Sholom Goldstein's struggles in the immediate aftermath of the attack.

18. Plaintiff Hendel Lezer is a citizen of the United States and of the State of New York, and she resides in Kings County. She is the sister of Sholom Goldstein. She suffered emotional distress as a result of the Hamas terrorist attack on the No. 2 bus.

19. Plaintiff Dovy Goldstein is a citizen of the United States and of the State of New York, and he resides in Kings County. He is the brother of Sholom Goldstein. He suffered emotional distress as a result of the Hamas terrorist attack on the No. 2. bus.

20. Plaintiff Chaya Chana Hoffman is a citizen of the United States and of the State of New York, and she resides in Kings County. She is the sister of Sholom Goldstein. She suffered emotional distress as a result of the Hamas terrorist attack on the No. 2. bus.

21. Plaintiff Yaakov Yosef Goldstein is a citizen of the United States and of the State of New York, and he resides in Kings County. He is the brother of Sholom Goldstein. He suffered emotional distress as a result of the Hamas terrorist attack on the No. 2. bus.

22. Plaintiff Bas-Sheva Goldstein is a citizen of the United States and of the State of New York, and she resides in Kings County. She is the sister of Sholom Goldstein. She suffered emotional distress as a result of the Hamas terrorist attack on the No. 2 bus.

23. Plaintiff Moishe Goldstein is a citizen of the United States and of the State of New York, and he resides in Kings County. He is the brother of Sholom Goldstein. He suffered emotional distress as a result of the Hamas terrorist attack on the No. 2 bus.

24. Plaintiff Perla Goldstein is a citizen of the United States and of the State of New York, and she resides in Kings County. She is the sister of Sholom Goldstein. She suffered emotional distress as a result of the Hamas terrorist attack on the No. 2 bus.

25. Plaintiff Toby Goldstein is a citizen of the United States and of the State of New York, and she resides in Kings County. She is the sister of Sholom Goldstein. She suffered emotional distress as a result of the Hamas terrorist attack on the No. 2 bus.

26. Plaintiff Yisroel Yehuda Goldstein is a citizen of the United States and of the State of New York, and he resides in Kings County. He is the brother of Sholom Goldstein. He suffered emotional distress as a result of the Hamas terrorist attack on the No. 2 bus. He was born at 37 weeks on August 21, 2003, two days after the terrorist attack, when his mother suffered such emotional distress that she went into labor.

27. Defendant Arab Bank is a Jordanian bank with headquarters in Amman, Jordan. Arab Bank's common stock is publicly traded on the Amman Stock Exchange. Arab Bank owns, controls, and/or operates more than 600 branches in 30 countries, including branches in Jordan, territory controlled by the Palestinian Authority, and the United States. Arab Bank is majority owned and controlled by the shareholders of Arab Bank Group, a Jordanian holding company. Both Arab Bank and Arab Bank Group constitute a single Jordanian banking institution.

28. Arab Bank conducts business in, and is registered to conduct business under the laws of, the State of New York. Arab Bank has operated a branch in New York since 1982. The branch is located at 150 East 52nd Street, New York, NY, 10022. Arab Bank's New York branch has provided clearing and correspondent bank services to Arab Bank's worldwide branches and affiliated banking institutions, as well as to other foreign banks. These services include services with respect to many transactions and acts detailed below.

FACTUAL ALLEGATIONS

Hamas Is a Terrorist Organization That Conducts Terrorist Attacks Against Israel.

29. Hamas is a radical Islamist terrorist organization that conducts Jihad and is committed to the destruction of Israel and the establishment of an Islamic society in Palestine. Hamas was founded in December 1987, and its name is an acronym for Harakat al-Muqawama al-Islamiyya, which translates to "Islamic Resistance Movement." Hamas operates in Palestine and has committed numerous terrorist attacks and suicide bombings, including anti-Israel attacks on civilian targets in Israel, the West Bank, and the Gaza Strip. Through its terrorist attacks, Hamas has killed hundreds of people and injured scores more.

30. The fact that Hamas is a terrorist organization that carries out terrorist attacks is well-known and well-publicized. Hamas has publicly claimed responsibility for numerous terrorist attacks, including the August 19, 2003, terrorist attack that injured the Plaintiffs in this case. Numerous countries—including the United States, the European Union, the United Kingdom, Australia, and Canada—have identified Hamas as a terrorist organization.

31. Since 1997, the United States has designated Hamas as a Foreign Terrorist Organization (FTO). This designation happened by publication in the Federal Register, has been renewed every two years since, and is publicly available on the website of the United States Department of State. Through this public designation, the United States has announced to the world that Hamas is a terrorist organization committed to the destruction of civilized society and the murder of innocent men, women, and children. Hamas is joined on the FTO list by some of civilization's most reviled organizations, including al-Qa'ida, the Islamic State of Iraq and the Levant (ISIL), and Boko Haram.

32. Hamas nominally contains two wings: a political wing and a paramilitary wing. In reality, the entire Hamas organization operates as a single entity, with each "wing" supporting Hamas's terrorist objectives.

33. The military wing of Hamas is known as the Izz ad-Din al-Qassam Brigades. The Brigades conduct suicide bombings and other terrorist attacks in Israel, Palestinian-controlled territories, and elsewhere. Hamas's preferred method of terror and mass murder is the suicide bombing, whereby an individual carries an explosive into a crowded public place and then detonates the bomb, killing or maiming people within the vicinity. These bombs are typically packed with ball bearings, nails, bolts, and other shrapnel, which lodge themselves in the bodies of their innocent victims, causing pain, suffering, and often death. Hamas and its sympathizers regard these suicide bombers as "martyrs."

34. Hamas's political wing includes the "Dawa," which is a network of "charities" supposedly dedicated to the provision of social services and humanitarian aid. In reality, these charities are front organizations controlled by Hamas, its members, agents, and operatives, who use the organizations for the purpose of funding and supporting the operations and terrorist activities of Hamas. These charities and related organizations are integral to Hamas's terrorist activities because they allow Hamas to finance its acts of terror, strengthen its status among Muslims, and indoctrinate Palestinians with its ideology.

35. Hamas collects significant sums of money through these charities. These funds are routed to support Hamas's military and other terrorist activities. Hamas uses such funds for, *inter alia*, weapons, explosives, transportation, communications, training, education, safe houses, and salaries and compensation for its terrorists, their families, and terrorist recruiters. Hamas

also uses these funds to provide financial support to suicide bombers and other terrorists, and their families.

36. Hamas has established or taken control of charitable and social institutions across Palestine and elsewhere, including but not limited to: the Islamic Charitable Society of Hebron; the Jenin Zakat Committee; the Al-Tadamun Islamic Charitable Society; the Nablus Zakat Committee; the Tulkarem Zakat Committee; the Ramallah Al Bireh Zakat Committee; the Al Islah Charitable Society; Mujama Al Islamiya (Islamic Center, Gaza); Al Jamiya Al Islamiya (Islamic Society, Gaza); Al Salah Islamic Society; and the Al Nur Prisoner Society. The fact that Hamas controls and operates these charities for the purpose of supporting its terrorist activities is well-known and well-publicized, and was known to Arab Bank at all relevant times.

37. Arab Bank "maintained accounts for senior Hamas leaders, *and* Hamas-controlled charities, *and* facilitated Saudi Committee payments to Hamas charities, Hamas prisoners, and the families of Hamas suicide bombers, all during the extreme violence of the Second Intifada." *Linde v. Arab Bank, PLC*, 97 F. Supp. 3d 287, 335 (E.D.N.Y. 2015).

38. Hamas is a Foreign Terrorist Organization that knowingly, willfully, and unlawfully combines, conspires, confederates, and agrees to commit numerous acts of international terrorism and other related criminal activity, including murder, attempted murder, solicitation to commit murder, physical violence, and other acts of international terrorism as defined by 18 U.S.C. §§ 1331, 1332, and other related acts of murder, attempted murder, solicitation to commit murder, providing material support to terrorists and terrorist organizations, and financing terrorism, in violation of 18 U.S.C. §§ 2339A, 2339B, 2339C, and other provisions of the federal criminal code of the United States.

Hamas Commits Numerous Terrorist Attacks During the Second Intifada.

39. In September 2000, Palestinian organizations including Hamas launched a sustained terror campaign against Israel, its citizens, and other civilians in Israeli territory. This campaign came after the collapse of peace negotiations at Camp David earlier in 2000. The campaign came to be known as the Second Intifada, the *Al-Aqsa Intifada*, or the *Intifada Al Quds*.

40. The Second Intifada lasted for years, during which time Hamas and other terrorist organizations conducted numerous suicide bombings and other terrorist attacks throughout Israel and Palestinian-controlled territories. More than 600 Israeli civilians were killed in Israel, the West Bank, and the Gaza Strip between 2000 and 2005 alone. Hamas's role in conducting terrorist attacks during the Second Intifada is well-known and well-publicized, and Hamas itself proclaimed responsibility for many of these terrorist attacks.

41. Hamas's objectives, and the objectives of the Second Intifada, include intimidating and coercing the civilian population of Israel, and influencing the policy and conduct of the government of Israel through intimidation, coercion, mass destruction, murder, assassination, and kidnapping. Hamas's objectives include coercing Israel to withdraw from territory it controls and, ultimately, to cease to exist as a nation.

42. The numerous acts of international terrorism that Hamas knowingly and willfully committed during the Second Intifada include, but are not limited to, the following attacks:

a. March 28, 2001 bombing of the Neve Yamin gas station near Kfar Saba;

b. June 1, 2001 bombing of the Dolphinarium discotheque in Tel Aviv;

c. August 9, 2001 bombing of a Sbarro pizzeria in Jerusalem;

d. December 1, 2001 bombing on Ben Yehuda Street in Jerusalem;

e. December 12, 2001 Emmanuel Settlement bus attack in the West Bank;

f. March 7, 2002 shooting attack on the Atzmona settlement in Gaza;

g. March 9, 2002 bombing of the Café Moment coffee shop in Jerusalem;

h. March 27, 2002 "Passover massacre" at the Park Hotel in Netanya;

i. May 7, 2002 bombing of the Sheffield Club in Rishon Letzion;

j. June 18, 2002 bombing of an Egged bus at Patt Junction in Jerusalem;

k. July 31, 2002 Hebrew University cafeteria bombing in Jerusalem;

l. September 19, 2002 bombing of Bus No. 4 on Allenby Street in Tel Aviv;

m. January 29, 2003 shooting attack on Route 60 near Ofra;

n. March 5, 2003 Bus No. 37 bombing in Haifa;

o. March 7, 2003 shooting attack at the Kiryat Arba settlement in the West Bank;

p. April 30, 2003 bombing of Mike's Place, a bar in Tel Aviv;

q. May 18, 2003 bombing of Bus No. 6 in Jerusalem;

r. June 11, 2003 bombing of Bus No. 14A at Davidka Square in Jerusalem;

s. June 20, 2003 shooting attack on Route 60 near Jerusalem;

t. August 19, 2003 bombing of Bus No. 2 in Jerusalem;

u. September 9, 2003 bombing of Café Hillel in Jerusalem;

v. October 22, 2003 shooting in the Tel Rumeida neighborhood of Hebron;

w. January 29, 2004 bombing of Bus No. 19 on Gaza Street in Jerusalem; and

x. September 24, 2004 bombing of Neve Dekalim in the Gaza Strip.

Hamas Commits the "Children's Bus Bombing" of August 19, 2003.

43. Hamas committed the "Children's Bus Bombing" terrorist attack of August 19, 2003. That evening, a Hamas terrorist suicide bomber disguised as a religious Jew boarded a

crowded No. 2 Egged bus in Jerusalem and detonated a five-kilogram bomb packed with ball-bearings. The blast killed 23 people, wounded more than 130 people, and caused widespread injury and devastation. Many of the victims were returning from praying at the Western Wall when they were killed. "Streets were littered with body parts, clothing, shattered glass and charred debris from the blast." Molly Moore & John Ward Anderson, *18 Killed, More Than 100 Injured*, WASH. POST, Aug. 20, 2003, https://goo.gl/BfWv5t. The bomb blew out the windows of the bus, "smearing human remains on a preceding tour bus. . . . On a street strewn with broken glass and bloodied sheet metal, a man knelt near the shattered bus to perform mouth-to-mouth resuscitation on a toddler." James Bennet, *Bombing Kills 18 and Hurts Scores More on Jerusalem Bus*, N.Y. TIMES, Aug. 19, 2003, http://goo.gl/qvfTpZ.

44. The attack of August 19, 2003 came to be known as "The Children's Bus Bombing" because of the large number of children who were aboard the bus and were killed or injured by the attack. Among those killed by the attack were: Shmuel Taubenfeld, 3 months old; Shmuel Zargari, 11 months old; Tehilla Nathanson, 3 years old; Issachar Reinitz, 9 years old; Avraham Bar-Or, 12 years old; Binyamin Bergman, 15 years old; Elisheva Meshulami, 16 years old; Chava Nechama Rechnitzer, 19 years old; and Miriam Eisenstein, 20 years old. The oldest person killed by the bombing was Fruma Rahel Weitz, 73 years old.

45. Plaintiff Sholom Goldstein was 19 years old and studying abroad in Israel at the time of the attack. He was severely injured during the Children's Bus Bombing. On the day of the attack, he had prayed at the Western Wall and was returning home aboard the No. 2 bus. He was aboard the No. 2 Bus when the explosion occurred, and he absorbed a significant amount of the impact of the explosion. When the suicide bomber detonated the bomb, Sholom Goldstein fell to the ground and was rendered unconscious. He eventually woke up and was in terrible

pain. His entire body ached, including his arms and legs. He was covered in soot. His glasses were gone and his clothes were ripped. His jacket was covered in blood and human remains. He was hospitalized, and had his eyes bandaged for more than a day due to a scratched cornea. He also suffered a perforated eardrum, and to this day he still suffers from permanent hearing loss. About six months after the attack, Sholom Goldstein came home from a haircut and discovered a piece of shrapnel still lodged in his head.

46. In addition to his physical injuries, Sholom Goldstein suffered and continues to suffer mental anguish emotional distress. For months after the attack, and still today, Sholom Goldstein has had nightmares and flashbacks about that tragic day in August 2003. He still meets regularly with a rabbi and counselor to discuss his ongoing stress and anxiety. To this day, he remains afraid and unwilling to travel on public transportation in Israel.

47. Plaintiffs Sarah Breina Goldstein and Rabbi Simcha Goldstein, the mother and father of Sholom Goldstein, suffered mental anguish and extreme distress as a result of the terrorist attack that injured their son. Sarah Breina Goldstein was pregnant at the time of the attack, and her doctor has stated that the emotional stress of the terrorist attack caused her to have the baby two days after the attack, in the 37th week of her pregnancy.

48. Plaintiffs Shaina Kutten, Shimon Goldstein, Yechezkal Shraga Goldstein, Avrohom David Goldstein, Hendel Lezer, Dovy Goldstein, Chaya Chana Hoffman, Yaakov Yosef Goldstein, Bas-Sheva Goldstein, Moishe Goldstein, Perla Goldstein, Toby Goldstein, and Yisroel Yehuda Goldstein suffered mental anguish and extreme distress as a result of the terrorist attack on the No. 2 bus. Yisroel Yehuda Goldstein also suffered physical pain as a result of his birth at 37 weeks.

49. Hamas knowingly and willfully organized and conducted the terrorist attack of August 19, 2003. Hamas acknowledged its own role in the attack by claiming responsibility for the attack and identifying the suicide bomber as a Hamas terrorist named Raed Abdul Hamid Misk. Hamas released a "video will" of Misk, in which Misk announced that he would carry out the attack. Hamas recruited Misk to conduct the bombing, provided him with financial and logistical support, and has provided financial support to his family as a reward for Misk's terrorist activities. Arab Bank knew or recklessly disregarded that Hamas organized and conducted the attack of August 19, 2003.

50. The governments of Israel and the United States have acknowledged that Hamas committed the attack on August 19, 2003. The Israeli police have identified Misk as a member of Hamas and the perpetrator of the attack. On August 21, 2003, the Israel Defense Forces killed Ismail Abu Shanab, a senior Hamas leader, in retaliation for Hamas's organization and direction of the August 19, 2003, attack. And on August 22, 2003, the United States Department of the Treasury stated: "By claiming responsibility for the despicable act of terror on August 19"—i.e. the Children's Bus Bombing—"Hamas has reaffirmed that it is a terrorist organization committed to violence against Israelis and to undermining progress toward peace between Israel and the Palestinian people." Press Release, U.S. Dep't of Treasury, *U.S. Designates Five Charities Funding Hamas and Six Senior Hamas Leaders as Terrorist Entities* (Aug. 22, 2003), https://goo.gl/d91TYz.

Arab Bank Participates in a Plan to Finance Palestinian Terrorism.

51. Hamas and other terrorist organizations need money to fund their terrorism. This money is needed for numerous activities including to carry out attacks; train and compensate personnel; purchase weapons, explosives, and other instruments of terror; facilitate

communications; maintain safe houses; compensate and recruit terrorists and their families; and indoctrinate the public with their ideology. Hamas needs financial and banking services to obtain, save, store, and transfer money.

52. Hamas and other terrorist organizations need money to compensate their terrorists and the families of suicide bombers. Hamas and its affiliates and supporters provide financial support to suicide bombers and other terrorists, and their families. This support includes lump-sum and monthly payments to a suicide bomber's family, along with mourning and housing expenses. This support is vital to Hamas's terrorist activities because it assists Hamas in recruiting suicide bombers and also increases support for Hamas among Palestinians and other populations.

53. Arab Bank transferred millions of dollars on behalf of numerous "charities" and other committees (including the Saudi Committee, discussed below) whose avowed purpose was to support terrorists and their terrorist activities during the Second Intifada.

54. One organization that funds Hamas's terrorist activities is the Saudi Committee in Support of the Intifada Al Quds (the Saudi Committee). The Saudi Committee was founded on or about October 16, 2000, as a private charity registered with the Kingdom of Saudi Arabia. It was established to fund the terrorist activities of Hamas and other organizations involved in the Second Intifada, and its stated purpose is to fund "all suffering families—the families of the martyrs and the injured Palestinians and the disabled." The Saudi Committee has provided more than $15 million of support for the Second Intifada.

55. The Saudi Committee helps Hamas and other Palestinian terrorist organizations in part by providing compensation to the families of Hamas suicide bombers and other terrorists. Benefits are provided to the survivors of deceased terrorists, and to terrorists who are injured or

captured by Israel. These benefits are provided as an incentive and reward to all terrorists, regardless of their affiliation with any particular terrorist group. This financial support is critical to the terrorist activities of Hamas and other groups because it provides them with the financial resources necessary to recruit, train, and compensate terrorists, and because it helps them win the hearts and minds of Palestinians and others.

56. The financial support that the Saudi Committee provides includes a comprehensive "death benefit" of more than $5,000 to the surviving families of Palestinian terrorists and suicide bombers, including Hamas terrorists and suicide bombers. Hamas, the Saudi Committee, and their supporters consider these terrorists to be "martyrs." The Saudi Committee paid death benefits for about 200 martyrs during its first year of existence.

57. Arab Bank actively facilitated and participated in the scheme to distribute benefits to the families of "martyrs" and others eligible for coverage. Arab Bank served as the exclusive administrator of the Saudi Committee's death benefits program. The Saudi Committee, and other affiliates and representatives of terrorist groups including Hamas, provided Arab Bank with a detailed list of the names of the martyrs, along with other personal identifying information, including each martyr's date and manner of death. Arab Bank then maintained a database of these martyrs and opened an account for each beneficiary. The families of these martyrs were then encouraged to collect the terrorism benefits through an Arab Bank branch.

58. To collect the benefit from Arab Bank, the surviving families of "martyrs" presented to Arab Bank a certification from the Palestinian Authority that established that their family member was, in fact, a martyr entitled to the death benefit. This certification included a unique identification number. Upon receipt of adequate documentation, Arab Bank disbursed the money to the family and issued a receipt for the martyrdom insurance benefit.

59. The Saudi Committee also wired money through Arab Bank directly to Hamas and the front "charities" that Hamas controls. From 1999 to 2004, Hamas-controlled charities received approximately $15 million that originated with the Saudi Committee. Arab Bank knowingly facilitated these transactions to Hamas and its front charities.

60. Arab Bank is committed to supporting Hamas and other terrorists and helping them to achieve their terrorist objectives. Arab Bank knowingly and willfully transferred money to support Hamas, the terrorists, and the families of the terrorists, who conducted terrorist attacks including the August 19, 2003 Children's Bus Bombing. Arab Bank knowingly and willfully maintained the database of martyrs and provided the death benefits to the terrorists and their families. At all relevant times, Arab Bank knew that these benefits were provided by Hamas, its affiliates, and the Saudi Committee, and that the benefits were intended to be an incentive and reward for suicide bombers and other terrorists. Arab Bank knew at all times that its activities were providing material support and financing to terrorists and terrorist organizations, including Hamas, and that the funds it transferred on behalf of the Saudi Committee and Hamas would be used to finance and support terrorism.

61. These benefits and compensation packages were administered through Arab Bank because use of Arab Bank's services provided a highly efficient and effective platform for distributing the benefits. Arab Bank has and had branches in Palestine and throughout the Middle East, allowing for easy transfer of funds across borders and combat zones. Arab Bank provided safe and secure terror financing, and provided a superior means of transferring money than a courier service or the Palestinian Authority. Arab Bank's reputation and veneer of legitimacy enhanced the status and visibility of the death benefits and other methods of financial support.

62. The Saudi Committee raised its money primarily in Saudi currency. That money was converted into U.S. dollars through Arab Bank's New York branch and then routed to local branches of Arab Bank in the West Bank. Saudi currency could not easily be converted into Israeli currency, which is the currency most commonly used in Palestinian-controlled areas. Arab Bank provided a valuable service through its New York branch by converting the Saudi currency into U.S. dollars, which were then routed to the local branches of Arab Bank.

63. The Saudi Committee, Hamas, and other terrorist organizations widely advertised their death benefits program and the fact that the benefits were administered through and with the cooperation of Arab Bank. For example, the Saudi Committee advertised on its website that the death benefits were distributed through Arab Bank. That website listed "martyrs" and stated that bank accounts had been opened through Arab Bank in Palestine on behalf of the martyrs.

64. Arab Bank has transferred money to the name of Raed Abdul Hamid Misk, the Hamas terrorist who conducted the August 19, 2003 Children's Bus Bombing. This includes a transfer of $132.97 made on January 13, 2004. These payments were made on behalf of Hamas, the Saudi Committee, and their affiliates.

65. Arab Bank has transferred money to the name of Basel Muhammad Shafiq Abd Al-Qader Al-Qawasmeh, a senior Hamas commander who helped conduct the August 19, 2003 terrorist attack. This includes a transfer of $2,655.78. These payments were made on behalf of Hamas, the Saudi Committee, and their affiliates.

66. The Saudi Committee has also made 'martyr' payments to the family of the Hamas suicide attackers who perpetrated (1) the June 1 Dolphinarium bombing; (2) the August 9, 2001 Sbarro Pizzeria bombing; (3) the December 1, 2001 Ben Yehuda Street bombings; and

(4) the December 12, 2001 shooting attack on Bus No. 189 in Emmanuel. *Linde v. Arab Bank, PLC*, 97 F. Supp. 3d 287, 329 (E.D.N.Y. 2015).

67. By knowingly and actively participating in the foregoing activities, Arab Bank and its co-conspirators, the Saudi Committee and others, have knowingly aided and abetted each and every terrorist act committed by Palestinian terrorists since the formation of the Saudi Committee's universal insurance coverage scheme in October 2000 in violation of 18 U.S.C. § 2332, 18 U.S.C. § 2339A, 18 U.S.C. § 2339B and 18 U.S.C. § 2339C. Arab Bank has knowingly participated in the process for the purpose of supporting and providing financial assistance to terrorists, including, but not limited to Hamas and other designated Foreign Terrorist Organizations, agents of Hamas and other Hamas-controlled organizations, families of Hamas operatives and the families of other terrorists.

Arab Bank Knowingly Provided Financial Services to Hamas, Its Members, and Its Charities.

68. Arab Bank knowingly provided financial and banking services to Hamas and its terrorists and front organizations, with the purpose and effect of supporting Hamas's terrorist activities. Arab Bank and its New York branch have knowingly facilitated transfers of money to Hamas, its leaders and agents, and front "charities" controlled by Hamas.

69. Arab Bank has knowingly maintained bank accounts on behalf of, and transferred money to, known Hamas operatives. For example, Arab Bank has maintained an account for Osama Hamdan, a senior Hamas spokesman, and Sheik Ahmed Yassin, a Hamas leader. Arab Bank has transferred money to numerous Hamas leaders, terrorists, and their families, including: (1) Halima Hassan Yassin, the wife of Sheik Yassin, (2) Ismail Haniyeh, the Bureau Chief of Sheik Yassin's Bureau, (3) Ismail Abu Shanab, a founder of Hamas, and (4) Abbas Al-Sayyed,

who has confessed responsibility for Hamas's Park Hotel bombing on March 27, 2002. *Linde v. Arab Bank, PLC*, 97 F. Supp. 3d 287, 303 (E.D.N.Y. 2015).

70. Arab Bank knowingly maintained bank accounts on behalf of, transferred money to, and/or provided financial services to Hamas's front organizations and "charities" that it controlled, including: the Islamic Charitable Society of Hebron; the Jenin Zakat Committee; the Al-Tadamun Islamic Charitable Society; the Nablus Zakat Committee; the Tulkarem Zakat Committee; the Ramallah Al Bireh Zakat Committee; the Al Islah Charitable Society; Mujama Al Islamiya (Islamic Center, Gaza); Al Jamiya Al Islamiya (Islamic Society, Gaza); Al Salah Islamic Society; and the Al Nur Prisoner Society. These charities funneled money to Hamas via Arab Bank. Hamas relies upon the financial support of these front charities. These charities, with the assistance and material support they received from Arab Bank, have helped Hamas grow and conduct its terrorist activities.

71. Arab Bank has allowed the transfer of at least $32,000,000 of funds into the Arab Bank accounts of these charities. At least $15,000,000 of those transfers were originated by the Saudi Committee. *Linde v. Arab Bank, PLC*, 97 F. Supp. 3d 287, 328 (E.D.N.Y. 2015).

72. Arab Bank has knowingly laundered funds for the Holy Land Foundation for Relief and Development, a Texas-based organization that raises funds in the United States for Hamas. Arab Bank has channeled funds for this organization through its New York branch. The leaders of the Holy Land Foundation have been sentenced to prison for providing material financial support to Hamas.

73. Arab Bank knowingly provided banking services, financial services, and other material financial support to Hamas, its operatives, and its charities even though it knew that Hamas and its operatives are terrorists and that the charities are front organizations controlled by

and for Hamas. At all relevant times, Arab Bank knew that Hamas was a terrorist organization and that Hamas depended upon the financial support of the Saudi Committee and its charities. Arab Bank knew that Hamas and its charities have given money to Palestinians who were wounded, killed, captured, or incarcerated as a result of the Second Intifada. Arab Bank knowingly provided this material support with the intention of supporting Hamas's agenda of terror.

74. By knowingly or recklessly providing services and material support directly to the Saudi Committee, Hamas, its members, terrorists, charities, and front organizations, Arab Bank has substantially assisted Hamas in furtherance of its conspiracy to commit multiple acts of international terrorism and has committed numerous overt acts in furtherance of the conspiracy. Without Arab Bank's assistance, the leaders of these terrorist organizations would have significant difficulty in transferring foreign contributions to terrorists.

Arab Bank Has Been Held Liable For Providing Material Support to Hamas.

75. Numerous complaints have been filed against Arab Bank for its violations of the ATA. In 2004, in the United States District Court for the Eastern District of New York, a consolidated jury trial was held for many of those complaints, including: *Linde v. Arab Bank, PLC*, No. 04–2799; *Litle v. Arab Bank, PLC*, No. 04–5449; *Almog v. Arab Bank, PLC*, No. 04–5564; *Coulter v. Arab Bank,* No. 05–365; *Afriat–Kurtzer v. Arab Bank, PLC*, No. 05–388; *Bennett v. Arab Bank, PLC*, No. 05–3183; *Roth v. Arab Bank, PLC*, No. 05–03738; and *Weiss v. Arab Bank, PLC*, No. 06–1623.

76. On September 22, 2014, the jury in that consolidated trial found Arab Bank liable, under the Anti-Terrorism Act, 18 U.S.C. § 2333(a) and § 2339B, for providing material financial support to Hamas, a Foreign Terrorist Organization. Some of the plaintiffs in that case were

injured in the August 19, 2003, Children's Bus Bombing that injured the Plaintiffs in this case. In light of this jury verdict, Arab Bank is estopped from denying the allegations of this complaint.

77. On April 8, 2015, District Judge Brian M. Cogan denied most of Arab Bank's Rule 50 motion for judgment as a matter of law and all of Arab Bank's Rule 59 motion for a new trial. The District Court upheld the jury's finding that Hamas committed 22 terrorist attacks, including the August 19, 2003 Children's Bus Bombing that injured the Plaintiffs in this case. The District Court concluded that Arab Bank's assertion that Hamas was not responsible for those attacks was "an assertion not remotely supported by the record." *Linde v. Arab Bank, PLC*, 97 F. Supp. 3d 287, 330 (E.D.N.Y. 2015).

78. On or about February 24, 2005, Arab Bank entered into a consent decree with the United States Office of the Comptroller of the Currency, whereby Arab Bank agreed to significantly reduce the banking operations at its New York branch. The Comptroller found an "inadequacy of the Branch's controls over its funds transfer business," including a failure to adequately monitor funds transfers for suspicious activity. The Comptroller found that these violations were "especially serious in light of the high risk characteristics of many of the transactions." On or about August 17, 2005, the Office of the Comptroller of the Currency, in conjunction with the United States Financial Crimes Enforcement Network, assessed a $24 million fine against Arab Bank. The fine, levied in connection with the February 2005 Consent Decree, was assessed because Arab Bank "failed to implement an adequate anti-money laundering program" and failed to "manage the risks of money laundering and terrorist financing in connection with United States dollar clearing transactions."

CLAIMS FOR RELIEF

COUNT I
Violation of 18 U.S.C. §§ 2339B, 2333
Providing Material Support to a Foreign Terrorist Organization

79. Plaintiffs incorporate by reference the allegations of the preceding paragraphs.

80. By knowingly, recklessly, and purposefully collecting and transferring funds from and to Hamas and its agents, front charities, and the Saudi Committee, Arab Bank has knowingly, recklessly, and purposefully provided material support or resources to a Foreign Terrorist Organization, and attempted and conspired to do so, in violation of 18 U.S.C. § 2339B.

81. As set forth more fully above, Arab Bank's financial services and assistance and material support substantially assisted Hamas, a Foreign Terrorist Organization, in recruiting and compensating terrorists, and in carrying out its objectives and acts of terror, including the attack of August 19, 2003, that injured the Plaintiffs in this case.

82. Arab Bank knowingly, recklessly, and directly provided material support to Hamas. This material support was given directly to Hamas and was actually transferred to Hamas and aided Hamas in the commission of its terrorist activities. Arab Bank knew or recklessly disregarded at all relevant times that Hamas is a Foreign Terrorist Organization and that Hamas engages in terrorism and commits terrorist acts.

83. Arab Bank knew or recklessly disregarded at all relevant times that the Saudi Committee and other groups that are affiliated with Hamas, support Hamas, and/or are fronts for Hamas have used Arab Bank to provide death benefits and other benefits and services to terrorists and their families. Arab Bank knew or recklessly disregarded that these benefits and services directly and materially supported and assisted Hamas's terrorist activities.

84. Without Arab Bank's material and substantial assistance, the funding of Hamas and of the death coverage and dismemberment benefit plans for terrorists and their families would have been substantially more difficult to implement.

85. Plaintiffs' injuries were caused by and incurred by reason of Arab Bank's activities that are set forth above.

86. By knowingly providing material support to Hamas, a Foreign Terrorist Organization, and attempting and conspiring to do so, in violation of 18 U.S.C. § 2339B, Defendant Arab Bank is jointly and severally liable pursuant to 18 U.S.C. § 2333 for any and all damages that Plaintiffs have sustained as a result of their injuries.

COUNT II
Violation of 18 U.S.C. §§ 2339C, 2333
Financing of Terrorism

87. Plaintiffs incorporate by reference the allegations of the preceding paragraphs.

88. The financial services that Arab Bank has willfully and unlawfully provided to Hamas, the Saudi Committee, and other related terrorist organizations and terrorists has been and will be used to directly facilitate acts intended to cause death or serious bodily injury to civilians such as the Plaintiffs in this case.

89. Arab Bank has knowingly, willfully, unlawfully, and directly provided and collected funds for Hamas, its terrorists, front organizations, and the Saudi Committee, with the intention that such funds be used, and with the knowledge that such funds would be used, to carry out acts intended to cause death or serious bodily injury to the civilian Plaintiffs in this case. This material support was given directly to Hamas and was actually transferred to Hamas and aided Hamas in the commission of its terrorist activities.

90. The acts committed against the Plaintiffs were intended to intimidate or coerce the civilian population of Israel, to influence the policy of the government of Israel by intimidation and coercion, and to affect the conduct of the government of Israel by mass destruction and murder.

91. At all relevant times, Arab Bank intended and knew that the funds it received as deposits and transmitted to Hamas and its affiliated organizations would be used for conducting acts of international terrorism.

92. Without Arab Bank's material and substantial assistance, the funding of Hamas and of the death coverage and dismemberment benefit plans for terrorists and their families would have been substantially more difficult to implement.

93. Plaintiffs' injuries were caused by and incurred by reason of Arab Bank's activities that are set forth above.

94. By knowingly financing Hamas's terrorist activities, and attempting and conspiring to do so, in violation of 18 U.S.C. § 2339C, Defendant Arab Bank is jointly and severally liable pursuant to 18 U.S.C. § 2333 for any and all damages that Plaintiffs have sustained as a result of their injuries.

COUNT III
Violation of 18 U.S.C. §§ 2339A, 2333
Providing Material Support to Terrorists

95. Plaintiffs incorporate by reference the allegations of the preceding paragraphs.

96. As set forth more fully above, the financial and administrative services that Arab Bank has knowingly and directly provided to Hamas, terrorists, their families, and the front organizations of Hamas, have provided material support or resources to the preparation and carrying out of violations of 18 U.S.C. § 2332 and other acts of international terrorism that have

injured Plaintiffs. At all times, Arab Bank knew and intended that its material support would be used in the preparation for, and carrying out of, such violations of the law and acts of terror.

97. Arab Bank has knowingly and directly provided to the terrorists, their families, and Hamas financial services and other material support to the preparation and carrying out of numerous acts of international terrorism that have injured Plaintiffs. This material support was given directly to Hamas and was actually transferred to Hamas and aided Hamas in the commission of its terrorist activities.

98. The assistance provided by Arab Bank, including in disbursing death benefits and maintaining financial accounts on behalf of the Saudi Committee, Hamas, its operatives, and its front charities, has provided material support and assistance to Hamas. Without Arab Bank's material and substantial assistance, the funding of Hamas and of the death coverage and dismemberment benefit plans for terrorists and their families would have been substantially more difficult to implement.

99. Plaintiffs' injuries were caused by and incurred by reason of Arab Bank's activities that are set forth above.

100. By participating in the commission of violations of 18 U.S.C. § 2339A, that have caused each of the Plaintiffs to be injured in his or her person, business, or property, and/or to be the survivor and heir of a United States national so injured, Arab Bank is jointly and severally liable pursuant to 18 U.S.C. § 2333 for any and all damages that Plaintiffs have sustained as a result of their injuries.

COUNT IV
Violation of 18 U.S.C. §§ 2332(b), 2333
Conspiracy to Commit Murder and Attempted Murder of United States Citizens

101. Plaintiffs incorporate by reference the allegations of the preceding paragraphs.

102. Plaintiffs were injured in their person, property, or business by reason of violent acts or acts dangerous to human life committed by Hamas, and/or are survivors and heirs of a United States national so injured, that are a violation of the criminal laws of the United States, including by attempting to kill and conspiring to kill, U.S. citizens, as set forth in 18 U.S.C. § 2332.

103. These acts of Hamas, which include the August 19, 2003 bombing of the No. 2 Egged bus, were intended to intimidate and coerce the civilian population of Israel, to influence the policy of the government of Israel by intimidation and coercion, and to affect the conduct of the government of Israel by mass destruction, assassination, or kidnapping. These acts by Hamas occurred primarily outside the territorial jurisdiction of the United States and transcend national boundaries in terms of the means by which they are accomplished, the persons they appear intended to intimidate or coerce, or the locale in which their perpetrators operate or seek asylum.

104. These acts were committed by Hamas with the knowledge of, intent to cause, and actual result of causing extreme physical and mental pain and suffering both to those within close proximity of the acts and to the family members of those within close proximity of the acts.

105. Arab Bank conspired, combined, and agreed to conspire and combine with other persons, including Hamas, to act unlawfully in violation of 18 U.S.C. § 2332, and Arab Bank committed overt acts in furtherance of the conspiracy. Arab Bank knew of the conspiracy and knew that the material support and financial services it provided to Hamas and its members and agents would be used in furtherance of the conspiracy.

106. Defendant Arab Bank knowingly and purposefully agreed to provide substantial financial services and material support to Hamas, its terrorists, and front organizations. This

material support was given directly to Hamas and was actually transferred to Hamas and aided Hamas in the commission of its terrorist activities. This material support included maintaining bank accounts for Hamas and its agents, receiving and processing the transfer of funds and benefits on behalf of Hamas and its agents, and assisting Hamas and its agents to fund their terrorist activities. Without Arab Bank's material and substantial assistance, the funding of Hamas and of the death coverage and dismemberment benefit plans for terrorists and their families would have been substantially more difficult to implement, and Hamas's agenda of terror would have been more difficult to finance.

107. Plaintiffs' injuries were caused by and incurred by reason of Arab Bank's activities that are set forth above.

108. By conspiring to act with Hamas to support, encourage, and facilitate violations of 18 U.S.C. § 2332 that have injured Plaintiffs, and/or caused them to be survivors and heirs of a United States national so injured, Defendant Arab Bank is jointly and severally liable pursuant to 18 U.S.C. § 2333 for any and all damages that Plaintiffs have sustained as a result of their injuries.

COUNT V
Violation of 18 U.S.C. §§ 2332(b), 2332(c), 2333
Aiding and Abetting the Attempted Murder and Physical Injury of United States Citizens

109. Plaintiffs incorporate by reference the allegations of the preceding paragraphs.

110. Plaintiffs were injured in their person, property, or business by reason of violent acts or acts dangerous to human life committed by Hamas, and/or are survivors and heirs of a United States national so injured, that are a violation of the criminal laws of the United States, including the prohibition against killing, attempting to kill, conspiring to kill, and engaging in

physical violence with the intent to cause, and actually causing, serious bodily injury to a United States national, as set forth in 18 U.S.C. §§ 2332(b), 2332(c).

111. These acts of Hamas, which include the August 19, 2003 bombing of the No. 2 Egged bus, were intended to intimidate and coerce the civilian population of Israel, to influence the policy of the government of Israel by intimidation and coercion, and to affect the conduct of the government of Israel by mass destruction, assassination, or kidnapping. These acts by Hamas occurred primarily outside the territorial jurisdiction of the United States and transcend national boundaries in terms of the means by which they are accomplished, the persons they appear intended to intimidate or coerce, or the locale in which their perpetrators operate or seek asylum.

112. These acts were committed by Hamas with the knowledge of, intent to cause, and actual result of causing extreme physical and mental pain and suffering both to those within close proximity of the acts and to the family members of those within close proximity of the acts.

113. Arab Bank knowingly, recklessly, and purposefully provided substantial assistance to, and aided and abetted, Hamas, in the commission of these crimes. This support substantially assisted Hamas and others in recruiting, retaining, and incentivizing suicide bombers and other terrorists, and also allowed Hamas and others to free up funds for use in other military operations that resulted in death and injury, thereby preparing and facilitating acts of terrorism in violation of 18 U.S.C. § 2332 that have caused injuries to the Plaintiffs.

114. At all relevant times, Arab Bank knew or recklessly disregarded that Hamas is a Foreign Terrorist Organization, that Hamas engages in terrorism and commits terrorist acts, and that Hamas uses the charitable front organizations to finance its activities. Arab Bank knew or

recklessly disregarded that Hamas and its affiliates use Arab Bank to support their terrorist activities and administer death benefits.

115. Defendant Arab Bank knowingly, recklessly, and purposefully provided substantial financial services and material support to Hamas. This material support was given directly to Hamas, was actually transferred to Hamas, and aided Hamas in the commission of its terrorist activities. This material support included maintaining bank accounts for Hamas and its agents, receiving and processing the transfer of funds on behalf of Hamas and its agents, and assisting Hamas and its agents to fund their terrorist activities. But for Arab Bank's material and substantial assistance, the funding of Hamas and of the death coverage and dismemberment benefit plans for terrorists and their families would have been substantially more difficult to implement.

116. Plaintiffs' injuries were caused by and incurred by reason of Arab Bank's activities that are set forth above.

117. By aiding and abetting violations of 18 U.S.C. § 2332 that have injured Plaintiffs, Defendant Arab Bank is jointly and severally liable pursuant to 18 U.S.C. § 2333 for any and all damages that Plaintiffs have sustained as a result of their injuries.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that this Court:

a. Enter judgment against Arab Bank and in favor of each Plaintiff for compensatory damages;

b. Enter judgment against Arab Bank and in favor of each Plaintiff for treble damages pursuant to 18 U.S.C. § 2333;

c. Enter judgment against Arab Bank and in favor of each Plaintiff for any and all costs sustained in connection with the prosecution on this action, including attorneys' fees incurred in bringing this litigation;

d. Enter an order declaring that Arab Bank has violated the Anti-Terrorism Act, 18 U.S.C. § 2331 *et seq.*; and

e. Grant such other and further relief as this Court deems just and proper.

PLAINTIFFS DEMAND A TRIAL BY JURY ON ALL ISSUES SO TRIABLE.

Date: White Plains, New York
April 6, 2016

YANKWITT LLP

By: ______________________________
Russell M. Yankwitt
140 Grand Street, Suite 501
White Plains, New York 10601
Tel: (914) 686-1500
Fax: (914) 801-5930
russell@yankwitt.com
Attorneys for Plaintiffs